

that a flow of said gas is rectified in a direction away from a film formation surface of the substrate," the rejection asserts that the applicant has merely recognized another advantage which would flow naturally from following the suggestion of the prior art, and that this cannot be the basis for patentability when the differences would otherwise be obvious. Applicant respectfully disagrees with this conclusion, as there is no suggestion in the prior art to introduce the gas in a direction parallel with the first direction and so that a flow of gas is rectified in a direction away from a film formation surface of the substrate. As has been noted, this feature is advantageous in that the fine particles and fragmented particles are not deposited onto the film formation surface. Izu describes a system in which gas is introduced in a direction normal to the first direction. The admitted prior art describes as problematic a system in which the gas is introduced in a direction parallel to the first direction. As such, nothing in the admitted prior art or Izu would have led one of ordinary skill in the art to modify Izu's approach to adopt parallel gas introduction, let alone to rectify a flow of gas in a direction away from the film formation surface.

In addition, Izu is directed to a multi-chamber system. In the "Background of the Invention," Izu criticizes single chamber systems, noting that using a single chamber results in undesirable restrictions in "the optimization and manufacturing speed of the finished structure device." Izu further notes that performing the production of multilayer devices including adjacent layers of differing material types in a single chamber requires complex control apparatus and time consuming techniques, as well as added intermediate evacuation steps to avoid cross contamination. Izu, in the "Summary of the Invention," then goes on to describe the advantages of using multiple chambers.

By contrast, each of the admitted prior art, Komino and Yamazaki involves using a single chamber to perform multiple process steps that are performed in multiple chambers of Izu. Accordingly, since Izu is directed to a type of process that differs from that of the admitted prior art, Komino and Yamazaki, there would have been no motivation to combine the references in the manner set forth in the rejection.

For at least these reasons, the rejections should be withdrawn.

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Enclosed is a \$120 check for the Petition for Extension of Time fee. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: _____

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